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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MIKE FIELDS, an individual,  
  
Plaintiff,  
  
vs.  
  
MARLYN RAMIREZ, an individual,  
  
Defendant.

Case No. 2:21-cv-02102-CDS-EJY

**STIPULATION AND ORDER TO  
EXTEND CASE MANAGEMENT  
DEADLINES BY 60 DAYS AFTER THE  
COURT'S ORDERS ON PENDING  
MOTIONS**

(Second Request)

Mike Fields ("Plaintiff") and Marlyn Ramirez ("Defendant") (collectively, the "Parties") respectfully submit this Stipulation and Order to Extend Deadlines set forth in the Court's Order granting the first Joint Motion to extend deadlines, (ECF No. 38), by 60 days after the Court's last order on the pending Motion to Compel (ECF No. 42) and the pending Motion to Dismiss (ECF No. 47), whichever occurs later. Good cause exists to grant this request.

**A. The Discovery Completed to Date:**

The Complaint was filed on November 30, 2021 (ECF No. 1). Defendant, appearing *pro*

se filed her Answer to the Complaint on December 28, 2021 (ECF No. 14). Defendant filed a motion for pro bono referral on March 24, 2022 (ECF No. 23); which was denied on March 25, 2022 (ECF No. 24). On April 6, 2022, Defendant filed a motion for a stay of discovery (ECF No. 25), which was denied on May 5, 2022 (ECF No. 29). The Parties filed a Joint Discovery Plan and Scheduling Order on May 12, 2022 (ECF No. 30), which was granted on May 13, 2022 (ECF No. 31). Defendant engaged counsel, and on August 17, 2022, counsel for Defendant entered a notice of appearance (ECF No. 34). Plaintiff filed a motion to compel the production of documents on December 2, 2022 (ECF No. 42). To date, the Parties have propounded the following discovery:

Date	Propounded Discovery	Response Date
6/16/2022	Plaintiff's First Set of Request for Production of Documents; First Set of Interrogatories; and First set of Requests for Admission	7/16/2022, extended to 8/1/2022
8/8/2022	Defendant's First Set of Request for Production of Documents and First set of Interrogatories	9/7/2022
9/7/2022	Plaintiff's Second Set of Interrogatories	10/7/2022, extended to 10/21/2022

**B. The Discovery That Remains to be Completed:**

The parties anticipate follow-up will be necessary concerning the discovery that has been propounded and responded to, to date including resolution of Plaintiff's pending motion to compel. The parties also anticipate conducting additional written discovery and deposition discovery.

**C. The Reasons Why Discovery Was Not Completed:**

Discovery is not complete because the parties are presently engaged in a discovery dispute that is the subject of Plaintiff's pending motion to compel.

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1                   **D. Proposed Schedule For Completing Remaining Discovery:**

2                   By this joint motion and stipulation, the Parties agree and request an extension of the case  
3 management deadlines for 60-days after entry of the Court's order on the Motion to Compel and  
4 the Motion to Dismiss, whichever occurs last, as follows:

5

Event	Current Deadline	Extended Deadline
Discovery Cut-off Date	11/30/2023	60-days after the Court's order on the Motion to Compel.
Dispositive Motions	3/1/2023	60-days after the Court's order on the Motion to Compel.
Pre-Trial Order	4/5/2023	60-days after the Court's order on the Motion to Compel.

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9                   **E. Good Cause:**

10                  Good cause exists for the requested extension because both the Motion to Compel and the  
11 Motion to Dismiss are pending. If the action is not dismissed as a result of the Motion to Dismiss,  
12 the Motion to Compel will need to be decided and the parties anticipate the need to conduct follow-  
13 up written discovery and party depositions. If the action is dismissed as a result of the Motion to  
14 Dismiss, the requested extension of time will operate to conserve both party and judicial resources.

15                  In addition, the Parties have engaged in settlement discussions in a good faith effort to  
16 resolve this dispute. Good cause also exists for the requested extension due to the time necessary  
17 to obtain approvals for offers, to allow time to prepare and finalize a settlement agreement, and to  
18 allow time to conduct a mediation or a judicial settlement conference – if necessary.

19                  This request is not made for the purposes of delay and the parties represent that good cause  
20 exists to grant the requested extension.

21                  Therefore, to conserve time and resources of the parties and the Court, and in good faith,  
22 the parties seek an extension of 60-days following the Court's last order on the Motion to Dismiss  
23 and the Motion to Compel.

IT IS SO AGREED AND STIPULATED this 26th day of January 2023.

/s/ Caleb Hatch

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**IT IS SO ORDERED:**

  
UNITED STATES MAGISTRATE JUDGE

DATED: January 27, 2023